

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
FIELDWOOD ENERGY, LLC, <i>et al.</i>	§	
	§	Case No. 20-33948 (MI)
Debtors. ¹	§	
	§	(Jointly Administered)
	§	

**RLI INSURANCE COMPANY’S WITNESS AND EXHIBIT LIST
[Relates to Docket No. 1284 and 1482]**

RLI Insurance Company (“RLI”), by and through undersigned counsel, hereby offers this witness and exhibit list (“Witness and Exhibit List”) for the hearing on approval of Debtors’ Fourth Amended Plan of Reorganization (“Plan”) [Docket No. 1284] scheduled for June 18, 2021, at 9:30 a.m. (CDT), before the Honorable Marvin Isgur, United States Bankruptcy Court for the Southern District of Texas (“Hearing”).

WITNESSES

RLI may call any of the following witnesses at the Hearing:

1. David Grycz, RLI Insurance Company;

¹ The “Debtors” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

2. Any witness called or listed by any other party;
3. Any witness necessary to authenticate or lay of the foundation for the admission of any exhibits; and
4. Any rebuttal and/or impeachment witnesses.

EXHIBITS

RLI may offer into evidence any of the following exhibits at the Hearing:

No.	Description	Offered	Objection	Admit	Disposition After Trial
1.	Declaration of David Grycz				
2.	Indemnity Agreements				
3.	Panaco East Breaks Escrow Account Escrow and Security				
4.	RLI Bond No. RLB0001509				
5.	RLI's Plan Objection with exhibits and any referenced Bonds [Docket No. 1482]				
6.	RLI's Proof of Claim and Claim Addendum with exhibits				
7.	Any pleadings or exhibits previously filed in the Court's docket				
8.	Any exhibit identified or offered by any other party				
9.	Any demonstrative exhibits necessary for the Hearing				
10.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

RLI reserves all objections regarding the admissibility of any evidence and reserves the right to modify, supplement, or amend this Witness and Exhibit list at any time prior to the Hearing on this matter.

Respectfully submitted,

KREBS FARLEY & DRY, PLLC

/s/ Jonathan Ord

Ryan D. Dry – (TX Bar No. 24050532)
(SDTX Bar No. 618363)
909 18th Street
Plano, TX 75074
Telephone: (972) 737-2530
Facsimile: (972) 737-2543
rdry@krebsfarley.com

and

KREBS FARLEY & DRY, PLLC
Elliot Scharfenberg (*pro hac vice*)
(LA Bar No. 35304)
Jonathan Ord (*pro hac vice*)
(LA Bar No. 35274)
400 Poydras Street, Suite 2500
New Orleans, LA 70130
Telephone: (504) 299-3570
Facsimile: (504) 299-3582
escharfenberg@krebsfarley.com
jord@krebsfarley.com

Counsel for RLI Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June 2021, a true and correct copy of the foregoing ***Witness and Exhibit List*** of RLI Insurance Company was sent via ECF Noticing to all parties registered to receive CM/ECF Notices in these Chapter 11 cases.

/s/ Jonathan Ord

Jonathan S. Ord